DAVID T. BIDERMAN, Bar No. 101577
JUDITH B. GITTERMAN, Bar No. 115661
M. CHRISTOPHER JHANG, Bar No. 211463
PERKINS COIE LLP
Four Embarcadero Center, Suite 2400
San Francisco, CA 94111-4131
Telephone: (415) 344-7000
Facsimile: (415) 344-7050
Email: DBiderman@perkinscoie.com
Email: JGitterman@perkinscoie.com
Email: CJhang@perkinscoie.com

Attorneys for Defendant Google Inc.

Lester L. Levy (Admitted Pro Hac Vice)
Michele F. Raphael (Admitted Pro Hac Vice)
WOLF POPPER LLP
845 Third Avenue
New York, NY 10022
Telephone: 212.759.4600
Facsimile: 212.486.2093
e-mail: llevy@wolfpopper.com
e-mail: mraphael@wolfpopper.com

Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CLRB HANSON INDUSTRIES, LLC d/b/a INDUSTRIAL PRINTING, and HOWARD STERN, on behalf of themselves and all others similarly situated, Plaintiffs, v. GOOGLE, INC., Defendant.	CASE NO. C O5-03649 JW **JOINT UNDISPUTED LIST OF PENDING MOTIONS TO SEAL**

Dockets.Justia.com

Pursuant to the Court's August 20, 2007 Order, the parties submit the following joint undisputed list of pending motions to seal:

With respect to Plaintiffs' Motion for Partial Summary Judgment, there are three pending motions to seal:

1. Plaintiffs' Motion to Seal portions of:

- Plaintiffs Amended Supplemental Memorandum in Support of Plaintiffs Motion for Partial Summary Judgment; and
- Amended Supplemental Declaration of Michele F. Raphael in Support of Plaintiffs Motion for Partial Summary Judgment (Redacted copies filed on 5/21/07 due to Defendant's confidential transcript designations, with which Plaintiffs disagree).

Plaintiffs' Motion to Seal

Date Filed:	**Caption:**	**Docket #**
5/21/07	Plaintiffs' Notice of Motion and Administrative Motion Pursuant to Civ. L.R. 79-5(d) To File Under Seal Portions of Amended Documents Due to Confidential Designations by Defendant Google Inc.	137
5/21/07	Declaration of Michele F. Raphael in Support of Plaintiffs' Administrative Motion Pursuant to Civ. L.R. 79-5(d) To File Under Seal Portions of Amended Documents Due to Confidential Designations by Defendant Google Inc.	138
5/21/07	[Proposed] Order Granting Plaintiffs' Administrative Motion Pursuant to Civ. L.R. 79-5(d) To File Under Seal Portions of Amended Documents Due to Confidential Designations by Defendant Google Inc.	139

Defendant's Response (In Agreement with Plaintiffs' Motion to Seal)

Date Filed:	**Caption:**	**Docket #**
5/29/07	Declaration of M. Christopher Jhang in Response to Plaintiffs' Second Motion to Seal Pursuant to Civ. L.R. 79-5(d) Portions of Amended Documents (Documents Nos. 137-139)	167
5/29/07	[Proposed] Order Regarding Plaintiffs' Second Motion to Seal Pursuant to Civ. L.R. 79-5(d) Portions of Amended Documents (Document Nos. 137-139)	166 AND 168 (Duplicate entry on docket)

2. Defendant Google Inc.'s Motion to Seal:

- Google Inc.'s Opposition to Plaintiffs Supplemental Memorandum in Support of Partial Summary Judgment; and
- Supplemental Declaration of M. Christopher Jhang in Support of Google Inc.'s Opposition to Plaintiffs Supplemental Memorandum in Support of Partial Summary Judgment (Documents submitted under seal, filed 5/21/07).

Defendant's Motion to Seal

Date Filed:	**Caption:**	**Docket #**
5/21/07	Google Inc.'s Notice of Administrative Motion and Motion for Leave to File Documents Under Seal in Connection with Google Inc.'s Opposition to Plaintiffs Supplemental Memorandum in Support of Partial Summary Judgment	147
5/21/07	Declaration of M. Christopher Jhang in Support of Google Inc.'s Motion for Leave to File Documents Under Seal in Connection with Google Inc.'s Opposition to Plaintiffs Supplemental Memorandum in Support of Partial Summary Judgment	148
5/21/07	[Proposed] Order Granting Google Inc.'s Administrative Motion for Leave to File Documents Under Seal in Connection with Google Inc.'s Opposition to Plaintiffs Supplemental Memorandum in Support of Partial Summary Judgment	149

Plaintiffs' Opposition

Date Filed:	**Caption:**	**Docket #**
5/24/07	Declaration of Michele F. Raphael in Opposition to Defendant Google Inc.'s Administrative Motion for Leave to File Documents Under Seal in Connection with Google Inc.'s Opposition to Plaintiffs Supplemental Memorandum in Support of Partial Summary Judgment	154
5/24/07	[Proposed] Order Denying In Part and Granting In Part Defendant Google Inc.'s Administrative Motion for Leave to File Documents Under Seal in Connection with Google Inc.'s Opposition to Plaintiffs Supplemental Memorandum in Support of Partial Summary Judgment	155

Defendant's Response

Date Filed:	Caption:	Docket #
5/31/07	Declaration of M. Christopher Jhang in Response to Plaintiffs' Opposition to Google Inc.'s Administrative Motion for Leave to File Documents Under Seal in Connection with Google Inc.'s Opposition to Plaintiffs Supplemental Memorandum in Support of Partial Summary Judgment (Document Nos. 154-155)	173

3. Plaintiffs' Motion to Seal portions of:

- Plaintiffs' Supplemental Reply Memorandum in Support of Plaintiffs Motion for Partial Summary Judgment (Redacted copy filed 5/29/07 due to Defendant's confidential transcript designations, with which Plaintiffs disagree).

Plaintiffs' Motion to Seal

Date Filed:	Caption:	Docket #
5/29/07	Plaintiffs' Notice of Motion and Administrative Motion Pursuant to Civ. L.R. 79-5(d) To File Under Seal Portions of Plaintiffs' Supplemental Reply Memorandum Due to Confidential Designations by Defendant Google Inc.	163
5/29/07	Declaration of Michele F. Raphael in Support of Plaintiffs' Administrative Motion Pursuant to Civ. L.R. 79-5(d) To File Under Seal Portions of Plaintiffs' Supplemental Reply Memorandum Due to Confidential Designations by Defendant Google Inc.	164
5/29/07	[Proposed] Order Granting Plaintiffs' Administrative Motion Pursuant to Civ. L.R. 79-5(d) To File Under Seal Portions of Plaintiffs' Supplemental Reply Memorandum Due to Confidential Designations by Defendant Google Inc.	165

Defendant's Response (In Agreement with Plaintiff's Motion to Seal)

Date Filed:	Caption:	Docket #
6/1/07	Declaration of M. Christopher Jhang in Response to Plaintiffs' Administrative Motion Pursuant to Civ. L.R. 79-5(d) To File Under Seal Portions of Plaintiffs' Supplemental Reply Memorandum (Document Nos. 163-165)	174

6/1/07	[Proposed] Order Regarding Plaintiffs' Administrative Motion Pursuant to Civ. L.R. 79-5(d) To File Under Seal Portions of Plaintiffs' Supplemental Reply Memorandum (Document Nos. 163-165)	175

With respect to Defendant Google Inc.'s Motion for Summary Judgment, there is one motion to seal pending:

1. Defendant Google Inc.'s Motion to Seal:

- Google Inc.'s Supplemental Brief in Support of Summary Judgment Motion; and
- Supplemental Declaration of M. Christopher Jhang in Support of Google Inc.'s Supplemental Brief in Support of Summary Judgment Motion (Documents submitted under seal, filed 5/7/07).

Defendant's Motion to Seal

Date Filed:	**Caption:**	**Docket #**
5/7/07	Google Inc.'s Notice of Administration Motion And Motion for Leave To File Documents Under Seal	120
5/7/07	Declaration of M. Christopher Jhang in Support of Google Inc.'s Motion for Leave To File Documents Under Seal	121
5/7/07	[Proposed] Order Granting Google Inc.'s Administrative Motion for Leave To File Documents Under Seal	122

Plaintiffs' Opposition

Date Filed:	**Caption:**	**Docket #**
5/10/07	Declaration of Michele F. Raphael in Opposition to Defendant Google, Inc.'s Administrative Motion for Leave to File Documents Under Seal	125
5/10/07	[Proposed] Order Denying Defendant Google Inc.'s Administrative Motion for Leave to File Documents Under Seal	127

With respect to the Joint Statement of Undisputed Facts, there is one motion to seal pending:

1. Defendant Google Inc.'s Motion to Seal:

- Joint Statement of Undisputed Facts (filed 6/12/07).

Defendant's Motion to Seal

Date Filed:	**Caption:**	**Docket #**
6/12/07	Google Inc.'s Administrative Motion for Leave to File a Document Under Seal Pursuant to Civ. L.R. 79-5	179
6/12/07	Declaration of M. Christopher Jhang in Support of Google Inc.'s Administrative Motion for Leave to File a Document Under Seal Pursuant to Civ. L.R. 79-5	180
6/12/07	[Proposed] Order Granting Google Inc.'s Administrative Motion for Leave to File a Document Under Seal Pursuant to Civ. L.R. 79-5	181

Plaintiffs' Opposition

Date Filed:	**Caption:**	**Docket #**
6/15/07	Declaration of Michele F. Raphael in Opposition to Defendant Google Inc.'s Administrative Motion for Leave to File a Document (The Joint Statement Of Undisputed Facts) Under Seal	182
6/15/07	[Proposed] Order Denying Defendant Google Inc.'s Administrative Motion for Leave to File a Document (The Joint Statement Of Undisputed Facts) Under Seal	183

//

//

//

//

//

//

In addition, in the Court's May 22, 2007 Order (docket item no. 151), the Court granted Plaintiffs' Notice of Motion and Administrative Motion pursuant to Civ. L.R. 79-5(d) to File Under Seal Portions of Documents Due to Confidential Designations by Defendant Google Inc. This motion and opposition thereto were docketed at nos. 114-116 and 128-134, respectively. However, this motion and opposition were superseded by the first motion and response listed herein, at docket nos. 137-139 and 166-168, respectively.

Dated**:** August 22, 2007

PERKINS COIE LLP

By: /S/
M. Christopher Jhang
Attorneys for Defendant Google Inc.

Dated**:** August 22, 2007

WOLF POPPER LLP

By: /S/
Michele F. Raphael
Attorneys for Plaintiffs CLRB Hanson Industries, Inc., et al.